

**Hindustan
Everest Tools
Limited**



Date: 30th June, 2021

To,
Manager (Listing)
BSE Limited,
Floor 25, P J Tower,
Dalal Street,
Mumbai -400001

CIN: L74899DL1962PLC003634
4/11, 1st Floor, Asaf Ali Road,
New Delhi - 110 002 (INDIA)
Ph. No.: +91 - 9910032394
Email: admin@everesttools.com
Website: www.everesttools.com

Re: Company's Code No. 505725

Subject: Submission of Annual Secretarial Compliance Report under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith Annual Secretarial Compliance Report duly issued by Parth P Shah, Practicing Company Secretary, for the financial year ended on 31st March, 2021.

This is for your information and records.

For **Hindustan Everest Tools Limited**

Devansh Gupta
Director
DIN: 06920376

PARTH P SHAH
PRACTICING COMPANY SECRETARY



C- 1108, 11th Floor, The First, Near Keshavbaug Party Plot, Vastrapur, Ahmedabad- 380015
Tel. No. : 8460753160, E-mail: parthshah507@gmail.com

Date: 29.06.2021

To,

The Board of Directors,

HINDUSTAN EVEREST TOOLS LIMITED

4/11, 1st Floor Asaf Ali Road,

New Delhi – 110002.

Sir/ Madam,

Annual Secretarial Compliance Report for the Financial Year 2020-21

I have been engaged by **HINDUSTAN EVEREST TOOLS LIMITED** (hereinafter referred to as 'the Company') bearing CIN: **L74110DL1962PLC003634** whose equity shares are listed on BSE Limited (Security Code: **505725**) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.





Secretarial Compliance Report of
HINDUSTAN EVEREST TOOLS LIMITED
(CIN: L74110DL1962PLC003634)
for the year ended 31.03.2021

I have examined:

- (a) all the documents and records made available to me and explanation provided by **HINDUSTAN EVEREST TOOLS LIMITED** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the Stock Exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 [**Not Applicable as there was no reportable event during the period under**



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review];

- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 [**Not Applicable as there was not reportable event during the period under review**];
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; [**Not attracted during the period under review**]
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 [**Not Applicable as there was no reportable event during the period under review**];
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 [**Not Applicable as there was no reportable event during the period under review**];
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; [**Not attracted during the period under review**].
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993; [**Not attracted during the period under review**];
and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder,
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
			NIL	



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PRACTICING COMPANY SECRETARY



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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31/03/2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	As informed by the management this being the first year of implanting the Regulation 23(9) SEBI (LODR) and besides payment of managerial remuneration and rent there was no other transactions of related party, hence, there was deviation in informing BSE.	Related Party transactions for the Half Year ended 31st March 2019 was not informed to BSE & for Half Year ended September 30, 2019 there was delay of 8 days in informing BSE.	Company has taken care and filed the Disclosure of Related Party transactions for the Half Year ended 31st March 2019 with the BSE with a delay of 416 days	Company has taken care of filing the said report for the FY 2020-21.

Signature:

Practicing Company Secretary: Parth P Shah

ACS No.: 48591

C P No.: 18640

UDIN: **AD48591C000542733**

Place: Ahmedabad

Date: 29.06.2021

